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FOR: Record
FROM: Michael L. Todorovich, Director
SUBJECT: Oversubscribed Pool Realignment
DATE: May 28, 2019

As we have previously discussed, and in accordance with my testimony in front of the Joint Legislative Committee on Flooding and the Subcommittee on Flooding, this memorandum is the official plan to realign priorities for the HMGP projects currently submitted under DR-4273 to place housing as the top priority for this agency going forward. This is a temporary policy and intended to immediately address 2016 flood relief concerns. The long term plan is still in development and is not to be impacted by this temporary policy.

Now that the State Emergency Operations Center hardening project has been cancelled, we need to identify additional infrastructure programs that we can immediately cancel. To that end, the State Hazard Mitigation Officer, or her designee, shall send a letter to sub applicants about their infrastructure projects to inquire if they would be willing to voluntarily cancel or withdraw.

Once these steps are complete, the HMGP office will contact the sub applicants to review application for infrastructure projects that fail to meet the FEMA mandated Benefit Cost Analysis. Simultaneously, the HMPG office needs to look at the housing PWs and rank order them based on their date of submission, first submitted to be funded first. If a housing project fails to qualify under the HMGP grant, WVDHSEM will send a letter to the sub applicant notifying them they do not meet HMGP guidelines. A letter will be sent to sub-applicants in housing projects notifying them that the application does not meet HMGP guidelines and requesting they notify WVDHSEM HMGP if their participants are accepted by another program.

Additionally, any project that has received a 3rd RFI from FEMA and has not provided WVDHSEM with responses to the RFI within the designated time period, shall be withdrawn immediately. The withdrawal notification shall be emailed and mailed to FEMA region III within 5 business days of the missed deadline with a copy of the withdrawal letter to the sub applicant.

Not later than June 20, 2019 a by name list of submitted HMGP projects, sorted by county and showing the number of participating homeowners, needs to be completed that shows the status of each Project, and if any project has been determined to be ineligible under the HMGP program. This list will show what program they have been referred to, and the date they were referred based on sub applicant responses to WVDHSEM. It is my intent to provide this list to the legislature not-later-than July 1, 2019. Any extensions to these deadlines will be considered by me. If HMGP requires additional resources, please let me know what they are as soon as possible.